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January 13, 2022

**VIA ECF**

The Honorable Katharine H. Parker, U.S.M.J.  
United States District Court for the  
Southern District of New York  
500 Pearl Street, Room 750  
New York, NY 10007  
[Parker\\_NYSDChambers@nysd.uscourts.gov](mailto:Parker_NYSDChambers@nysd.uscourts.gov)

Re: *Beale v. Redbubble, Inc. et al.*, Case 1:21-cv-5756-ALC-KHP

Dear Judge Parker:

Further to the recent Letter Motion to Adjourn Conference (Doc. 48) and Order granting same (Doc. 49), the parties have conferred and jointly request that the Court stay the case for the two-month period until the rescheduled Settlement Conference on March 22, 2022.<sup>1</sup> For the reasons previously shared with the Court and Defendants' counsel supporting the Letter Motion to Adjourn Conference (Doc. 48), the parties believe this brief stay will prove efficient by conserving the parties' resources and focusing their efforts on the rescheduled Settlement Conference. Moreover, the stay has the additional benefit of the Settlement Conference occurring at the point in the case that the Court originally envisioned in selecting January 12, 2022 for the Settlement Conference. If those efforts do not result in resolution of the case before or at the conference, the stay would account for but a minor alteration of the case schedule.

This action is currently in the fact discovery stage. To date, the parties have exchanged and responded to written discovery requests. Each has raised various issues with the opponent's written discovery responses and a meet-and-confer process regarding those concerns is in progress. Additionally, each party has begun document production. No depositions have yet been noticed or conducted.

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<sup>1</sup> The stay would not affect the timing of the updated pre-conference submission requirement set forth in the January 6, 2022 Order (Doc. 49)—i.e., by 5:00 PM EST on March 15, 2022.

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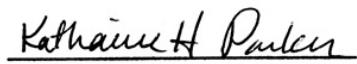
Except for the Letter Motion to Adjourn Conference (Doc. 48), this is the parties' first request to amend the case's schedule. The below table shows the remaining dates from the Court's Scheduling Order (Doc. 33) and suggested new dates:

Date	Suggested New Date	Event
March 31, 2022	May 27, 2022	Deadline to amend pleadings or join parties.
May 12, 2022	July 14, 2022	Deadline to complete depositions.
May 26, 2022	July 28, 2022	Deadline to complete fact discovery.
August 12, 2022	October 14, 2022	Deadline to complete expert discovery.

The parties thank the Court for its continued courtesies.

Stay is granted and the proposed dates to amend the scheduling order are granted.

APPLICATION GRANTED

  
Hon. Katharine H. Parker, U.S.M.J.  
1/18/2022

Respectfully submitted,

LIEF PARKE LLP



Richard E. Parke